

26 Court Street
Suite 603
Brooklyn, N.Y. 11242

DNIS

DAVIS, NDANUSA, IKHLAS & SALEEM, LLP

Tel: (718) 783-6819
Fax: (855) 852-4742
www.dnislaw.com

VIA ECF

July 6, 2022

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Annam, et al. v. City of New York, et al.
22-CV-02945 (LGS)

Dear Judge Schofield:

This law firm represents the Plaintiff in this matter. We write this joint letter in connection with the parties' initial conference.

On June 29, 2022 the parties appeared before Your Honor for an initial conference. During the conference Your Honor asked if Plaintiffs wished to amend their complaint. The undersigned counsel noted that Plaintiffs had already amended the complaint and that perhaps the best option was to limit the number of claims alleged. Your Honor's June 30 order reflects this where it reads, "by July 8, 2022, Plaintiffs shall file a letter stating on which claims Plaintiffs intend to proceed and which claims Plaintiffs consent to voluntarily dismiss."

After speaking further with Plaintiffs, we have determined that it is best to amend the complaint to include and exclude details. Some of the details that will be excluded will be the voluntary withdrawal of about eight defendants and about three claims. The complaint will also include additional facts to support the claims. Plaintiffs have discussed this matter with Defendants' counsel and Defendants' counsel have expressed no objections. We can file the amended complaint on or before July 8, 2022. Since an amendment was not considered at the conclusion of the initial conference, the parties respectfully request an amended briefing schedule as follows: August 19, 2022 for Defendants' motion, September 9, 2022 for Plaintiffs' opposition, and September 23, 2022 for Defendants' reply. The additional time requested will allow Defendants to review the amended complaint and adjust the motion accordingly.

The parties thank Your Honor for your time and consideration of this request.

Respectfully submitted,

/S/
Mustapha Ndanusa

Cc: Laura C. Williams, via email.
Stephen M. Suhovsky, via email
Attorney for Defendants